

UNITED STATE DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

The Satanic Temple, Inc.

*Plaintiff*

*v.*

Newsweek Digital LLC

*Defendant.*

1:22-cv-1343 (MKV)

**DECLARATION OF  
DR. JOSEPH LAYCOCK**

**COMES NOW** Dr. Joseph Laycock, who states as follows under penalty of perjury of the laws of the United States of America.

1. **Purpose.** This declaration is made in support of The Satanic Temple’s motion for summary judgment in the above cause.
2. **Identity and qualifications.** I am Dr. Joseph Laycock, an adult of sound mind with no felonies. I base the following statements on my own personal knowledge and under penalty of perjury.
3. **Background.** In connection with my career as a scholar of new religious movements, I wrote a book-length study on The Satanic Temple entitled *Speak of the Devil: How the Satanic Temple is Changing the Way We Talk about Religion*. Oxford University Press (2020).
4. **Foundation.** From 2013 – 2019, I interviewed over 50 people in connection with writing my book. I’ve talked with members, ex-members, attorneys, and critics of The Satanic Temple’s campaigns. I extensively interviewed The Satanic Temple’s central decisionmakers.
5. **Rumors of sexual harassment.** Ex-members shared rumors of sexual harassment, but I never heard any firsthand claims. These rumors were always nebulous, *e.g.*, “Women are flocking around Lucien Greaves and I think it’s creepy.”

6. **No first-hand accounts.** Nobody I interviewed could point me to an individual who personally claimed to have been sexually harassed.
7. **No cover-up.** I never heard any rumormongering about coverup of any sexual harassment.
8. **Context.** Ex-members usually shared a rumor attended by a complaint, largely surrounding the permissible scope of protest within The Satanic Temple, *e.g.*, being prohibited from throwing smoke bombs at Milo Yiannapolous (a far-right political commentator). To illustrate: “I left months ago because of a political issue; and, by the way, I heard some scandalous stuff happened.”
9. **Fieldwork.** From 2013 – 2019, I also did fieldwork in aid of writing my book. In August 2018, I visited Little Rock, Arkansas to attend The Satanic Temple’s “Rally for Religious Freedom.” I also attended various meetups and events. I saw enough to personally testify about the culture within The Satanic Temple.
10. **No sexual abuse or cover up.** I never saw or heard anything that would cause me to believe there was any permutation of sexual abuse or cover-up within The Satanic Temple.
11. **Conversation with Duin.** I talked with Julia Duin on October 27, 2021. The conversation lasted for at least half an hour. For most of which she mistook me for my father, Doug Laycock. About halfway into the conversation, I told her I think we should restart this interview because she didn’t even know who she was talking to.
12. **Experience with tabloids.** I have been interviewed by many sensationalist publications. I have never had my identity mistaken by an interviewer, not before talking with Duin and not since.

13. **Leading questions.** Duin's interview mostly entailed leading questions. When I negated the assumed fact within the question, it didn't get any traction.

14. **Request for confirmation.** During the interview, Duin indicated that she had interviewed QueerSatanic (the defendants in *United Federation of Churches LLC v. Johnson et al.*) and they had said all these horrible things about The Satanic Temple asked if I knew anything that would support their claims.

15. **No inquiry into sexual abuse or cover-up.** Duin did not ask me about sexual abuse or cover-up.

16. **Duin understood her sources' credibility issues.** Toward the end of the conversation, she said "I don't think this is just four disgruntled ex-members. I think this is really big." I responded, "I'm not sure this is more than four disgruntled ex-members." This didn't seem to register.

17. **Same-day deadline.** At some point during the conversation, Duin informed me that her deadline to provide the story to her editor was in one hour.

18. **Impression.** The conversation was the most egregious example of confirmation bias I have ever seen. I got the impression that Duin was just looking for a quote from me.

**FURTHER AFFIANT SAYETH NOT.**

Pursuant to 28 USC § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. *s/ Joseph Laycock*  
Executed on May 16, 2024.